

Summary Meeting Notes		Division of Environmental Health Department of Health Second Safety Workgroup February 1, 2005	
Facilitator:	Nancy Bernard	Note Taker(s):	Mark Soltman
Attendees:	Julie Awbrey, Spokane RHD; Greg Bawden, WSSDA; Shirley Carstens, SNOW; Bill Chaput, CEFPI; Mark Cooper, Parent; Paul Clark, WAMOA, Moses Lake SD; Dave DeLong, TPCHD; Ed Foster, WIFIS / Seattle Archdiocese; Mary Sue Linville, WASBO; Thelma Simon, Parent; Karen VanDusen, UW; John Wolpers, EHD; Kittitas County Health Department; Mike Cotey, L&I; Scott Emry, Risk Manager, LWSD; Jim Kerns, ESD 101; Eric Dickson, ESD 10; Scott LaBar, ESD112; John Richards, OSPI; Don Leaf, WSEHA; Candi Wines, SBOH; Chris Shaffer, ESD 101; Peggy Sandberg, ESD 112; Kas Kinkead, Cascade Design Collaborative, SFAB		
Absent:	Steve Barber, Deputy State Fire Marshall; James Green; Gary Jefferis, WAMOA, Everett SD; Kitty Johnson-Woods, EVSD	Guests:	Dave Bradley, Ecology Dawn Hooper, Ecology

AGENDA ITEMS	DISCUSSION
Playgrounds --There is a standard of care... CPSC document / ASTM standards	<p>-California adopted CPSC standards for playgrounds, necessitated licensing of inspectors to determine compliance... WSRMP: 12 – 14 claims due to equipment failure... after push for improvement: ~5 claims in 4 years (chains breaking).</p> <p>-OSPI - Capitol improvement now extends to playground equipment (?)</p> <p>- Most districts recognize that being in compliance with the standard is important... May be problematic if the rule requires that the CPSC standard be met. / would rather not have this as law</p> <p>-CPSC is the standard of practice, complying gives protection against liability ... not needing to be in law.</p> <p>-Surfacing under play equipment is a major issue</p> <p>-If we use guidelines... need to be sure that hazards are identified... empowering local safety committee at schools to address hazards... they would then apply guidance</p> <p>-Guidelines are advantageous... a guide has greater flexibility than rule... CPSC are good common sense approach</p> <p>-Explained that when documents are adopted in rule... that the document is "locked" to the version referenced. May be better to leave in guidance so that as CPSC & ASTM improve, compliance can move faster.</p> <p>-Playgrounds are looked at closely & aggressively under the current guidance - protective surfacing, and maintenance of it is a main issue</p> <p>-The ideas and issues need to be addressed... who is looking at it / are they qualified / maintenance & operation / inspection & measure of compliance</p> <p>-Safety.... <i>General language in the current rule, but not playgrounds... perhaps it should be specified that this is a target area (Section 140)</i></p> <p>-Injuries are not generally related to equipment failure... most injuries are from interaction of students</p> <p>-Possible problems with playground installation by PTA & other parent groups... what about certification by the manufacturer to install the equipment according to manufacturers instructions... what does the use of guidelines do to assure that the Manufacturer representative is typically present when school groups install equipment?</p> <p>-What about used equipment? How will guidelines assure that used equipment is properly installed?</p> <p>-Looking at what the rule currently provides... perhaps this could be modified to call for the review & acceptance before....</p> <p>-Problems are not with new equipment... has to do with maintenance of equipment.</p>

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<p>Playgrounds --There is a standard of care... CPSC document / ASTM standards, Cont.</p>	<p>-Plan review: Spokane Regional Health does the inspection for playground plans, may also require that the manufacturer inspect the equipment. Their schools are required to submit the plans, certify that CPSC/ASTM standards are met.</p> <p>-How do the school insurance folks oversee installation of equipment? Is there a gap with the insurance folks doing the oversight? What about rural districts?</p> <p>-Risk pools / insurers are often involved in school play ground equipment issues.</p> <p>-Installation: Schools may be notifying the insurer, but not the LHJ, LHJ may only catch on inspection, not plan review (if they do inspections, many LHJs do not) - Existing state rule requires LHJ plan review.</p> <p>-How to get plan review services in rural areas:... off-site plan review, or regional, or centralized plan review in OSPI</p> <p>-Centralized or regional plan review to oversee safety issues.</p> <p>-Insurance companies could be doing plan review</p> <p>-Caution... if things are required... how to pay for it?</p> <p>-some concerns with going through the LHJ, can be problematic and time consuming</p> <p>-Concerned about where small districts are installing used equipment without oversight... need to provide help to parents</p> <p>-Installation of play equipment does not require a building permit... typically not even part of a building construction... evaluation of equipment is done when the building is inspected for occupancy.</p> <p>-More problems with old equipment & playgrounds... particularly where there is no routine inspection of school facilities.</p> <p>-Thurston County does plan review and inspection of playground equipment / DOH & OSPI should look to implementation / service delivery to schools throughout the state... Ends, Districts, LHJs, cooperation and plan of service delivery /</p> <p>-Can we include playgrounds in the OSPI review / acceptance before payment of projects?</p> <p>-Looking at what the rule currently provides... perhaps this could be modified to call for the review & acceptance before....</p> <p>-Problems are not with new equipment... has to do with maintenance of equipment. before payment of projects?</p>
<p>Summary</p>	<p>-Keep CPSC guidelines as the technical framework</p> <p>-modify rules to include playgrounds in the plan review list in WAC 246-366-040a</p> <p>-and address plan review in general, including considering prohibiting the installation of used equipment that doesn't comply with current CPSC/ASTM standards</p> <p>-CPSC & ASTM guidelines would continue to be the technical (guidance) document</p> <p>-Still need to address the matter of monitoring and maintenance</p> <p>-Issue of surfacing under equipment, 25 years after the first guidelines, should playgrounds even be allowed w/o adequate surfacing?</p>
<p>Further Discussion</p>	<p>-Used equipment that does not meet CPSC standard should not be installed</p> <p>-Repair to current standards, by manufacturer approved equipment</p> <p>-Need to address inspection... by whom (qualifications), how frequently? -assure maintenance & inspection.</p> <p>-Implementation of guidelines... how do we address / use guidelines under the rule</p> <p>-Annual inspection...Insurance folks inspect playground equipment annually... the LHJ has -done some inspection... but not recently...perhaps a single / model playground inspection checklist & process</p> <p>-Purpose of inspection by insurance folks is different than the health department perspective... Coordinated activity is good... but not one replacing the other.</p> <p>-K-12 was developed to coordinate inspections</p>
<p>ACTION</p>	
<p>SUMMARY OF PLAYGROUND DISCUSSION</p>	<p>The group was in support in leaving technical matters in guidance, but expanding the rule to specify playgrounds in Plan Review (246-366-040) and in Safety list (246-366-140).</p>
<p>ACTION</p>	

AGENDA ITEMS	DISCUSSION
Contaminated Soils	<p>Dave Bradley and Dawn Hooper, Ecology, handout on Contaminated Soils at Primary & Secondary Schools</p> <ul style="list-style-type: none"> -Reviewed the Taskforce work of the previous Area Wide survey of soil contaminate issues / focus on schools / Children are at risk, due to their age & development and behaviors. Much of the focus of the task force was industrial contamination (primarily the Tacoma Smelter Plume) and old apple orchards where lead-arsenic pesticides were commonly used. -Addressing contaminated soils when building new facilities is minimal compared to addressing soil contamination at existing sites. -SBOH rule... site approval, plan review, focus on playgrounds... consolidating requirements that apply there. -Parent notification -Funding? Resources available? Needs? -CCA treated wood: widely varying exposures, Not ECY's focus right now -There is pending legislation on contaminated soils (SB 5125), Protection of children's health, land use, adjacent properties. -Role of OSPI during acquisition: state assistance is in the planning & construction... not the acquisition. -Project may not involve OSPI funding... health regulations should address all development projects... not just OSPI -Children as young as 3 years / also... matter of soil testing to identify hazard areas.... Particularly in mining communities... slag piles, etc. Site Evaluation should include a historical review of the site & activities that may impact health -Soil sampling... needs to be careful how this is approached... sampling is difficult to do... many samples can be drawn... but never enough... when is enough... enough? -ALTA survey... checklist relating to easements, right-of-ways, hazardous waste sites, may not be specified -Phase one Environmental reports may not be required, or address this issue -Area-Wide Task force developed checklist to address site acquisition -No way to define a soil sampling protocol for all soil sampling at sites -Address the matter of contaminated soil at point of plan review & site acquisition -Acquisition may be outside of the purview of the SBOH rule... but plan review / site inspection is -Remediation can bring benefits, even on small scale to reduce the exposure. -Cadmium, Arsenic, Lead all have different levels of risk and exposure for children. -Lead from paint / contaminated soils from various sources... -Lead paint seems not to be addressed in guidance or rule relative to the school environment / testing for lead / lead paint -Materials section / address the potential for health & safety concerns for materials... -Separate analysis is needed for various chemicals -Phase one analysis... focus on site conditions / a valuable screening tool. Sites and hazards are different... the phase one analysis approach has merit for initial assessment, Schools are tasked to do a SEPA... -Caution the establishment of a remediation approach. -Needs to be some look at sites for risk of contaminates... there needs to be assessment on each site... and then appropriate remediation... may be a full site or partial site development ... needs to be accomplished as part of the response to the identified risk. / Concerned that the acquisition stage is outside of the scope of the rule. Site screening / site acquisition evaluation tool need to look at all sources of contaminates... for example, not just soil, but other sources, such as water -Concerns for soil & site contamination should not be limited in the SBOH rules
ACTION	
SUMMARY OF DISCUSSION: CONTAMINATED SOILS	<ul style="list-style-type: none"> -Site & soil contamination... need to be sure these get reviewed & assessed in the process when appropriate response can be effectively, efficiently made. Testing should be based on past practices in the area and -Specific issues.... Arsenic & lead from Asarco smelter & fruit orchards, mining in area, potential for lead from other activities

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CCA treated wood	<ul style="list-style-type: none"> -banned by EPA / schools are not likely using this material at this time / Seattle/King County & Tacoma/Pierce County are conducting public education & outreach regarding potential contaminated soils in child-use areas -Do we need a section on materials? -Sustainable schools protocol / applicability here? / does CCA get addressed here? <p>May be more of an issue to address from children behavior. Also a concern for re-manufacturing the CCA wood on the site.</p> <ul style="list-style-type: none"> -New use of this material not likely an issue / maintenance is an issue, though play area ground surfaces and their condition is also frequently a hazard -How are protective surfaces in the play areas addressed?
SUMMARY OF DISCUSSION: CCA TREATED WOOD	<ul style="list-style-type: none"> -prohibit new installation -maintain in accordance with EPA guidance -prohibit eating on any CCA treated wood -require hand washing after play.
Fall Hazards	<ul style="list-style-type: none"> -how to address retaining walls in and adjacent to play areas? -Building code addresses some of this / may not be reviewed in plan review -IBC: railings need to be provided... does not address walls in landscape areas away from walk areas -L&I addresses some of these issues -Fall hazards need to be addressed throughout the school facility & grounds -Summary: Codes address fall hazards.... But minimum codes may not always provide protection -Need to work with OSPI & building codes to address minimum code, fall hazard protection, and student interaction with their physical environment -Building codes can be met while not providing safety for students. But needs to be some way to address risk -Plan review scope is expanding by practice to include site & landscape & topography / this review needs to be understood and is prudent -Walls immediately adjacent to equipment be treated as the play surfaces / other sites would need to be addressed to code
SUMMARY OF DISCUSSION: FALL HAZARDS & RETAINING WALLS	<ul style="list-style-type: none"> -Fall protection needs to be addressed in the rule / perhaps a separate section that would address the different settings for such hazards & options to address
Outdoor lighting	<ul style="list-style-type: none"> -Egress lighting is now addressed by IBC / path of egress -What about CPTED standards? -Outdoor lighting not now addressed in school rule / should be addressed and linked to other standards / particularly the route of egress -Existing codes provide adequate direction on lighting (egress) -Outdoor lighting for safety is an issue for design & review -Several entities are looking at lighting requirements... need to be coordinated -K-12 may well be the vehicle to address these types of issues, with references to applicable standards -What are the existing codes & what do they say for lighting? Does this specificity in the existing rule really need to be there? -Daylighting, controls, etc. -Lumens vs. footcandles / lighting design laboratory

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SUMMARY OF DISCUSSION: EGRESS LIGHTING AND OTHER FACILITY & LANDSCAPE LIGHTING	<ul style="list-style-type: none"> -Research what is in the IBC -Consult the Daylighting Lab -will consider information at the March 15th meeting
Safety /Athletics, PE, Sports	<ul style="list-style-type: none"> -injuries occurring on athletic fields: bases on baseball fields, soccer goals, etc. -AEDs.... Leave this to others / legislature to address the placement & requirements relative AEDs -What does the WIAA have in their standards / guides for sports equipment? Does CPSC address any of this? Are there standards available? -National Federation of High School Sports / what are these standards? Do they address the items we may be concerned about? Should they be referenced? -What injuries relate to equipment? Most injuries relate to need for oversight by teachers, coaches, playground monitors, etc., as frequently play and sport behaviors lead to injuries -Teachers and sports folks need first aid training & certification -use the K-12 H&SG for information on equipment standard for things like padding on equipment, etc. -What standards apply... are they different for athletics vs. PE? -Level of risk of injury, or severity of injury may be an element here -Teachers frequently do not have proper safety training... regardless of the academic topic area... science, PE, athletics -Need to apply after school standards to PE / what is the appropriate regulatory approach? We should be locating and citing existing standards.... K-12 guide... for all of the types of items we have addressed today. -Mandate safety training to the folks supervising student activities -Forgo a list of hazard equipment or conditions in rule... see that personnel are trained & required to be trained. -Standards for safety in this arena: Booklets from the National Federation of High School Sports / WIAA.org / First aid recommendations for coaches -PE Teachers Association... guide about behavior? -K-12 H&SG: look for specific items to address... based on claims management -Address in rule... mention scope for athletics / based on injury facts... with specifics in guidance -Javelin is a bad idea... but part of the track events list, also... increase use of synthetic turf materials... operation & maintenance requirements to keep these surfaces safe -Can standards typically used at school... be applied to off-campus activities?
SUMMARY OF DISCUSSION: Safety /Athletics, PE, Sports	<ul style="list-style-type: none"> -Reference sports & athletics safety in the WAC Safety Section -Use the K12 H&SG for specifics identified by CPSC (e.g. soccer goals), National Sports Injury Prevention groups (break-away or flush bases) artificial turf safety issues, or things identified through review of claims. -Include references to proper maintenance & sanitation of equipment -Established safety guidelines for sports from the National Federation of High Schools should be applied to PE & non-WIAA sports -consider how to apply safety guidelines to off-campus activities

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First Aid & CPR	<p>Handout from Shirley Carstens, summary of Requirements for School Staff for First Aid/CPR Training</p> <p><u>-Check with AAG to see if the last statement on K-12 relating to first aid, page 48 / S010 can be adopted as rule?</u></p> <p>-L&I requirements for first aid / nothing that directly addresses providing first aid for students... there should be a standard of care for first aid training.... There needs to be qualified first aid providers in schools for protection of students ... beyond that required for teachers & staff by L&I.</p> <p>-A resource issue.... Lack of nurses on school property, Need other means to provide first aid as nurses are rarely there</p> <p>-WAC 296-800-150 (L&I) could be a guide for language to apply to students...</p> <p>-How do we expand this to events outside of school periods?</p> <p>-Used to require that voc ed have first aid training, PE teachers need to be included with voc ed, chemistry, lab, etc.</p> <p>-Thurston county: FA training applies to everyone... perhaps every classroom needs trained folks</p> <p>-Training is expensive</p> <p>-Ratios.... Number of staff to students / need to have a minimum number so that folks are available</p> <p>-Training on asthma response is needed.</p> <p>-What about playground supervisors without first aid training or certification required?</p> <p>-Concerns about athletic trainers without certification</p> <p>-Concern raised about athletic trainers/coaches giving medication to students: RCW 28A- / Administration of medication prohibits this.</p> <p>-School functions / playground / science / base requirement for first aid based on risk and type of educational activity, number of students, etc.</p> <p>-Asthma response plan need to include / link with all teachers, coaches, field trip chaperones</p> <p>-Bus driver: first aid required, but not CPR</p> <p>-much of FA training is now web-based, cheap & easy, but how good can it be?</p>	
SUMMARY OF DISCUSSION: FIRST AID & CPR	<p>-recommend the inclusion in this WAC of requirements for first aid / CPR training for science, Career & Technical Ed, and PE teachers, playground supervisors, coaches, bus drivers, and some percentage of classroom teachers. If it is determined that this does not belong in this WAC, the SBOH will be asked to pursue this issue through other rule.</p>	
Future Issues:	<p>-Water retention ponds on school property, disconnect in various regulations</p> <p>-Crossing guards?: covered by existing rule & statute</p>	
HANDOUTS		NEXT MEETING 2/22/05
<p>-U.S. Consumer Product Safety Commission <i>Handbook for Public Playground Safety</i></p> <p>-DOH / OSPI K12 Health and Safety Guide</p> <p>-Safekids.org: Playground Injury Facts, Sports Injury Facts, School Injury Facts</p> <p>-Requirements for School Staff, F.A./CPR Trainings, ESD 112</p> <p>-Contaminated Soils at Primary and Secondary Schools, Ecology Talking Points</p>		<p>-decision agenda on the above items</p> <p>-Science Labs</p> <p>-Career & Technical Education Safety Issues</p> <p>-Visual & Performing Arts Safety Issues</p> <p>-Chemical storage / use / disposal / spill clean-up</p> <p>-emergency preparation</p>